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CORY SPENCER, DIANA MILENA  
REED, and COASTAL PROTECTION  
RANGERS, INC.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

CORY SPENCER, an individual;  
DIANA MILENA REED, an  
individual; and COASTAL  
PROTECTION RANGERS, INC., a

CASE NO. 2:16-cv-02129-SJO (RAOx)  
**DECLARATION OF GEOFF HAGINS  
IN SUPPORT OF PLAINTIFFS'  
OPPOSITION TO DEFENDANTS  
CITY OF PALOS VERDES ESTATES  
AND CHIEF OF POLICE JEFF**

1 California non-profit public benefit  
2 corporation,

3 Plaintiffs,

4 v.

5 LUNADA BAY BOYS; THE  
6 INDIVIDUAL MEMBERS OF THE  
7 LUNADA BAY BOYS, including but  
8 not limited to SANG LEE, BRANT  
9 BLAKEMAN, ALAN JOHNSTON  
10 AKA JALIAN JOHNSTON,  
11 MICHAEL RAE PAPAYANS,  
12 ANGELO FERRARA, FRANK  
13 FERRARA, CHARLIE FERRARA,  
14 and N. F.; CITY OF PALOS  
15 VERDES ESTATES; CHIEF OF  
16 POLICE JEFF KEPLEY, in his  
17 representative capacity; and DOES  
18 1-10,

19 Defendants.

**KEPLEY'S MOTION FOR SUMMARY  
JUDGMENT OR, IN THE  
ALTERNATIVE, SUMMARY  
ADJUDICATION**

Judge: Hon. S. James Otero  
Date: August 21, 2017  
Time: 10:00 a.m.  
Crtrm.: 10C

Complaint Filed: March 29, 2016  
Trial Date: November 7, 2017

20 I, John Geoffrey Hagins, declare as follows:

21 1. I am a 61-year-old, recently retired correctional officer, living in  
22 Missouri. I grew up in the Hollywood Riviera neighborhood of Torrance,  
23 California. I am a longtime surfer, and surfed regularly in the South Bay until  
24 I moved away in 1997. I have personal knowledge of the facts set forth  
25 herein, except as to those stated on information and belief and, as to those, I  
26 am informed and believe them to be true. If called as a witness, I could and  
27 would competently testify to the matters stated herein.

28 2. On December 29, 2016, I signed a declaration supporting  
Plaintiffs' Motion for Class Certification in the matter.

1           3.     This new declaration is to authenticate video footage of an  
2 incident where my nephew and I were assaulted by a Bay Boy back in 1995.  
3 While it has been just more than 22 years, I remember this day well. And,  
4 unfortunately, little has changed in the way the Bay Boys operate. And little  
5 has changed in how the City of Palos Verdes Estates treats outsiders –  
6 meaning outsiders are not welcomed in the City, being deterred by both the  
7 Bay Boys and the City itself.

8           4.     On March 13, 1995, a news crew accompanied myself and six  
9 other individuals to Lunada Bay and filmed the events that transpired. When  
10 we arrived, one of the people that I was with, Mike Bernard, recognized a  
11 Bay Boy who was on the bluff named Kelly Logan, who said we got a “pass”  
12 that day because they knew each other.

13           5.     As we were coming back up the trail, Bay Boy Peter McCollum  
14 approached me, screaming, “Don’t surf on the hill.” He was pounding his  
15 fists very close to my face as he told me, “This is what will happen to you if I  
16 see you again.” He continued to yell numerous things, including, “Come  
17 back and you will be killed.” He then assaulted me, all of which was caught  
18 on camera. He also threatened by nephew Hagan Kelly.

19           6.     I have watched the documentary The Swell Life, and it appears  
20 that the director obtained some of the footage from March 13, 1995. When I  
21 compare it to the footage from Channel 13 it appears identical; also the  
22 Channel 13 logo appears in sections of the video. This documentary  
23 accurately depicts Peter McCollum threatening my nephew and Mike  
24 Bernard, where McCollum screams: “He won’t surf here again, though, got  
25 it? Got it? You got that, son? You got it? Hey, hey, I’m touching nobody.  
26 Nothing. But you won’t surf here again, boy. You won’t surf here again.

27



1 Fuck that, fuck you guys! I've been here too long to take this shit." (5:14  
2 seconds to 5:31).

3 7. Later in the documentary the Swell Life, there is more film  
4 footage from the same day, where McCollum screams: "How many guys are  
5 at Malibu right now, huh? How many fucking guys are at Malibu, huh? (I  
6 don't know.) Did you ever notice we've done a good thing here, haven't we?  
7 It's pretty nice and pretty, huh? (It's beautiful.) It's beautiful! And so when  
8 you exploit it, we'll thank you." (15:05 to 15:19). This, too, is an accurate  
9 depiction of Peter McCollum on the day he threatened my nephew and me.

10 8. We did nothing to provoke Peter McCollum or any other resident,  
11 other than we were not from Palos Verdes Estates, and we showed up at a  
12 public beach from out of town.

13 I declare under penalty of perjury under the laws of the United States  
14 of America that the foregoing is true and correct.

15 Executed on this 30<sup>th</sup> day of July, 2017, at INDEPENDENCE  
16 Missouri.

17   
18 JOHN GEOFFREY HAGINS  
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